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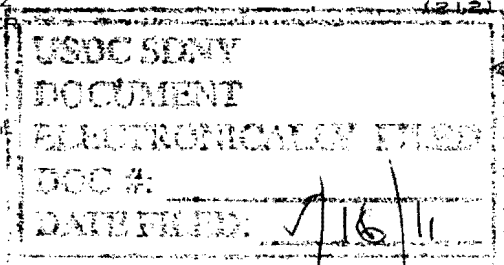
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May 11, 2011

BY FAX (212) 805-7928

Hon. Michael H. Dolinger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Oakley et. al. v. Verizon Communications, Inc. et al.
09 Civ. 9175 (CM) (MHD)

Dear Judge Dolinger:

On behalf of the plaintiffs in the above-referenced matter, I respectfully request a two-week extension of time, from May 13, 2011 to May 27, 2011, to file plaintiffs' motion for class certification.


The parties have conducted substantial discovery in this case, including 51 depositions and the exchange of more than 150,000 pages of documents. In preparing the class certification motion, plaintiffs have come to realize that more time than was anticipated is needed to review and analyze this volume of information. Defendants have consented to this request and the parties have agreed to a modified briefing schedule as follows:

May 27, 2011	Plaintiffs' Motion for Class Certification
July 28, 2011	Defendants' Opposition Papers
August 19, 2011	Plaintiffs' Reply Papers

Thank you for your consideration of this request.

ENDORSED ORDER
Application granted.
5/11/11

Very truly yours,

A handwritten signature in black ink, appearing to read "Daniel E. Clifton", written over a horizontal line.

Daniel E. Clifton

cc: Lorie E. Almon, Esq.
Krista Green Pratt, Esq.
Christie Del Rey-Cone, Esq.
Gabrielle Semel, Esq.
Mary K. O'Melveny, Esq.
Elaine L. Smith, Esq.